



DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS AIR COMBAT COMMAND  
LANGLEY AIR FORCE BASE, VIRGINIA

14 JUN 2000

MEMORANDUM FOR SEE DISTRIBUTION LIST

FROM: HQ ACC/CEVR  
129 Andrews Street, Suite 102  
Langley AFB VA 23665-2769

SUBJECT: Improper Low Level Radioactive Waste Shipments

1. Recently, two Air Force organizations violated established Air Force Instructions and policy letters when arranging for the disposal of Low-Level Radioactive Waste (LLRW). Attachment one provides the current Air Force policy on disposal of LLRW. These instructions also apply to the clean-up of radioactive waste sites.

2. HQ ACC/CEVR POC is Mr. Chuck Hill, CEVRE (757) 764-9323, DSN 574-9323, or [charles.hill@langley.af.mil](mailto:charles.hill@langley.af.mil)

JO ANN M. WHITSON

Acting Chief, Environmental Restoration

Attachments:

1. Distribution List
2. LLRW Policy

cc:

AFCEE/ERD w/Atch  
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HQ ACC/SGOP w/Atch

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DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS UNITED STATES AIR FORCE  
WASHINGTON DC

MAY 16 2000

MEMORANDUM FOR ALMAJCOM/CEV

FROM: AFMOA/CV  
110 Luke Avenue, Room 405  
Bolling AFB, DC 20332-7050

SUBJECT: Improper Low Level Radioactive Waste Shipments

Recently two AF organizations violated AFI 40-201, *Managing Radioactive Materials in the USAF*, HQ AFMOA/SGOR policy letter dated 5 Apr 96 (Atch 1), and the Department of Defense Executive Agency for Low-Level Radioactive Waste (LLRW) Charter dated 21 August 1997 (Atch 2). The violations occurred when the organizations arranged for disposal of LLRW without coordination through the Air Force Radioactive and Mixed Waste Office, IERA/SDRH (AFRMWO). As a result, both organizations face potential fines due to the infringement of LLRW compact laws.

Note that AFI 40-201 section 3.10, Managing Low Level Radioactive Waste Burial Sites, requires coordination with AFMOA/SGOR prior to remediation. Also, section 3.14 mandates coordination with AFRMWO prior to disposal of all LLRW. Please ensure that programs within your command understand the compliance requirements for LLRW remediation and disposal.

We request that you disseminate this memo to programs within your command. If you have questions concerning this memo, my point of contact is Ms. Julie Coleman at AFMOA/SGOR, 110 Luke Ave, Room 405, Bolling AFB, DC 20332-7050, or DSN 297-4306.

PAUL B. CHRISTIANSON, Col, USAF, MC, SFS  
Chair, USAF Radioisotope Committee  
Air Force Medical Operations Agency  
Office of the Surgeon General

*Attachments:*

1. HQ AFMOA Memo, 5 Apr 96
2. DOD EA Charter

cc:

ALMAJCOM/SG  
AMSIO-DMW  
AFCEE/CC  
IERA/SDRH(AFRMWO)

AW 2



DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS AIR FORCE MEDICAL OPERATIONS AGENCY  
BROOKS AIR FORCE BASE TEXAS

5 April 1996

MEMORANDUM FOR ALMAJCOM/CE/SG/LG/JA

FROM: HQ AFMOA/SGOR  
8901 18th St  
Brooks AFB TX 78235-5217


SUBJECT: Policy on the Disposal of Radioactive Material

Recently, the Department of Defense (DoD) was prohibited from radioactive waste disposal through the Defense Consolidation Facility (DCF) at Barnwell, South Carolina because some recent shipments directed by the DoD Executive Agent arrived at the facility in noncompliance with Federal and State of South Carolina regulations. In order to restore Air Force disposal access, the Air Force has agreed to implement the following policy.

All requests for radioactive material disposal or recycling actions must be in writing and approved by the Air Force Radioactive Waste Office (SA-ALC/EMP). No disposal or recycling activities may take place without this approval.

This policy is contained in Draft AFI 40-201, but in order to resolve the current disposal situation, is being implemented immediately.

If you have any questions, please contact Capt Montgomery at DSN 240-3331 or commercial (210) 536-3331. Telefax: DSN 240-4382, (210) 536-4382. E-Mail: montgom\_n@msa01.brooks.af.mil.

  
JOSEPH J. DONNELLY, LtCol, USAF, BSC  
Chief, USAF Radioisotope Committee Secretariat  
Office of the Surgeon General

cc:  
HQ AFMOA/SGO2 (Col Taylor)  
SA-ALC/EMP (Mr. Johnson)  
HQ AFSC/SEW (Capt Hoak)  
HSC/PKVBC (Ms Machacek)  
SC DHEC, V. Autry

Attach 1

**Department of Defense  
Charter  
for the  
Low-Level Radioactive Waste Disposal  
Executive Agent**

1. **AUTHORITY.** The Department of Defense (DoD) Low-Level Radioactive Waste Executive Agent is hereby established in accordance with:

- a. DoD Directive (DoDD) 4715.1, "Environmental Security," February 24, 1996.
- b. Department of Defense Instruction (DoDI) 4715.6, "Environmental Compliance," April 24, 1996.
- c. Government Accounting Office (GAO) Report RCED-90-96, "The Military Would Benefit From a Comprehensive Waste Disposal Program," March 23, 1990.
- d. Memorandum, Assistant Secretary of Defense for Installations and Logistics, Subject: DoD Low-Level Radioactive Waste (LLRW) Disposal Policy, September 3, 1992.
- e. Memorandum, Deputy Under Secretary of Defense for Environmental Security (Pollution Prevention), Subject: Department of Defense Low-Level Radioactive Waste (LLRW) Disposal Policy, January 10, 1994.

2. **BACKGROUND.**

- a. In 1990, the GAO recommended (Reference 1c):

"Under a comprehensive program, the military could consolidate existing management expertise and training to stay current with the requirements rather than having thousands of individuals around the country and overseas devoting time and effort to do so under separate programs."

- b. In 1992, the DoD designated the Army as the DoD LLRW Executive Agent for managing disposal of LLRW as a means of correcting past compliance problems (Reference 1d.) This designation was reconfirmed in 1994 (Reference 1e).

to taking any DoD LLRW disposal action. The DoD Executive Agency will review these disposal actions to ensure safe and compliant disposition. The DoD Component will provide information to the DoD Executive Agency of the quantity and place of disposal of any LLRW disposed of under this provision.

5. MEMBERSHIP. The Army as the DoD Executive Agent will execute the DoD LLRW Program for the U.S. Army, U.S. Air Force, U. S. Navy, Defense Logistics Agency, and other federal agencies as needed.

#### 6. FUNCTION/PROCESSES.

a. The Army's Executive Agency for Low-Level Radioactive Waste Disposal, subject to Army policy and guidance/oversight from the Assistant Secretary of the Army for Installations, Logistics, and Environment and the Deputy Assistant Secretary of the Army for Environment Safety and Occupational Health and the chain of command, is responsible for:

- (1) Assuring the safe, cost effective and compliant disposal of all DoD LLRW.
- (2) Conducting LLRW disposal for other federal agencies on a cost reimbursable basis, when permissible under applicable law and as otherwise appropriate.
- (3) Granting waivers, on a case-by-case basis, from the requirement that the DoD Executive Agency dispose of all LLRW. If it grants a waiver, the Executive Agency retains responsibility for ensuring proper disposal procedures are followed and maintaining historical disposal records. DoD components should forward requests for waiver to the Executive Agency. The request for waiver should include cost and technical information which shows that the DoD component will dispose of the waste in a safe and cost-effective manner and in accordance with all applicable legal requirements. If the Executive Agency denies a waiver, the party seeking the waiver may appeal the denial to the Low Level Radioactive Waste Disposition Advisory Committee for review.
- (4) Maintaining a liaison with States, compacts, and regulators.
- (5) Developing and maintaining procedures for LLRW disposal.
- (6) Drafting and coordinating DoD policy on LLRW.

(7) Providing requested technical assistance and training to all DoD components.

(8) Staying abreast of new and emerging LLRW disposal technologies.

(9) Developing and maintaining a central inventory of DoD LLRW disposal and component inventories awaiting disposal.

(10) Maintaining a central file of current State, Federal, and international regulatory requirements and an awareness program on applicable requirements and procedures.

(11) Providing an annual update to the Deputy Under Secretary of Defense (Environmental Security) on the status of the LLRW disposal program.

(12) Negotiating Interservice Support Agreements (ISSAs) with the DoD Components and Interagency Agreements (IAGs) with other federal agencies for the purpose of arranging for disposal of LLRW.

b. The DoD Components shall:

(1) Use the capabilities of the DoD Executive Agency for LLRW disposal as required by this charter, or obtain a case-by-case disposal waiver.

(2) Forward requests for waiver to the DoD Executive Agency for Low-Level Radioactive Waste Disposal at the HQ, IOC Rock Island, IL. Cost and technical information will accompany waiver requests. Cost information will include the cost of Executive Agency shipment inspections. This data will show that requester will dispose of the LLRW in a safe, compliant, and cost-effective manner.

(3) Provide information to the DoD Executive Agency of the quantity and location of disposal, of any LLRW disposed of pursuant to a waiver.

(4) Avoid the duplication of effort provided by the DoD Executive Agency for Low-Level Radioactive Waste Disposal.

c. The DoD Executive Agent shall establish a Low Level Radioactive Waste Disposition Advisory Committee (LLRWDAC). The LLRWDAC will report to the DoD Environmental Safety and Occupational Health Policy Board. Each DoD component and the Army Corps of Engineers will have a representative on the LLRWDAC. The LLRWDAC shall review program issues related to performance and policy issues associated with the DoD Executive Agency responsibilities. The LLRWDAC will approve waiver procedures and monitor their implementation.

7. FUNDING: The funding for this program will be as follows:

a. The Army will fund all DoD Executive Agency costs associated with paragraphs 6.a.3 - 6.a.12 above.

b. The DoD components shall fund all costs associated with paragraph 6.a.1 above, including actual costs and Executive Agency costs associated with the disposal effort.

c. Other federal agencies shall fund all costs associated with paragraph 6.a.2 above, including actual costs and Executive Agency costs associated with the disposal effort.

8. DEFINITIONS.

a. Hazardous Waste is any material defined in 40 CFR 261.3 and is subject to generator, transport, treatment, storage and disposal standards as specified in 40 CFR, Parts 262, 263, 264 and 265.

b. For the purpose of this charter Low-Level Radioactive Waste (LLRW) includes the following:

(1) Low Level Radioactive Waste: Any radioactive material consistent with applicable law that the Nuclear Regulatory Commission (NRC) classifies as LLRW.

(2) Mixed Waste: Any waste that contains both hazardous waste (as defined in paragraph 8.a. above) and radioactive materials (as defined in paragraph 8.b.(1) above), and/or NORM/NARM materials (as defined in paragraph 8.b.(3)).

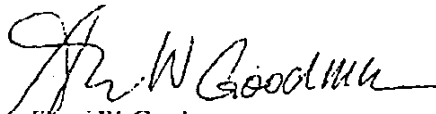


(3) NORM/NAKM waste: Any waste composed of Naturally Occurring Radioactive Material and/or Naturally Occurring or Accelerator-Produced Radioactive Material that DoD no longer needs.

c. Low-level radioactive waste disposal includes the packaging, handling, manifesting, transportation, treatment and/or disposition of LLRW.

d. LLRW Environmental Restoration: The process of identifying, investigating and remediating LLRW associated with RCRA corrective actions CERCLA response actions and Defense Environmental Restoration Program (DERP) actions. These actions include: Installation Restoration (IR), Formerly Used Defense Sites (FUDS) and Base Realignment and Closure (BRAC) actions.

9. EFFECTIVE DATE: This Charter is effective immediately and will remain in effect until rescinded. The LLRWDAC will review this Charter for applicability and modification. The review will occur every three years or whenever requested by a LLRWDAC member. The LLRWDAC will forward recommended changes to the Charter to the DoD ESOHPB for approval.

  
 Sherri W. Goodman  
 Deputy Under Secretary of Defense  
 (Environmental Security)

Date: 8/21/97

21 AUG 1997